



**SOUTH DADE**  
LOGISTICS & TECHNOLOGY DISTRICT  
BRING THE JOBS

## Response to Staff Comments



## **Introduction.**

This white paper is intended to address some of the issues raised by Miami-Dade County staff related to the pending South Dade Logistics & Technology District (“SDLTD”) Comprehensive Development Master Plan (“CDMP”) application.

The SDLTD represents the first major exercise in job creation in South Miami-Dade County in decades. The SDLTD is intended to help reverse a long-term development pattern that focused on low-density residential uses in this area -- to the detriment of both local residents and the County as a whole. The discussion below and the exhibits attached to this document will demonstrate:

- There is a demonstrated need to expand the Urban Development Boundary (“UDB”) to provide additional industrial land serving South Dade.
- The development of the SDLTD will not discourage infill and redevelopment elsewhere in South Dade or Miami-Dade County.
- The SDLTD is intended to help reverse an existing sprawl condition created over half a century of poor planning.
- The SDLTD application is consistent with the requirements of Policy LU-8H of the Land Use Element of the CDMP.
- The Applicant and Co-Applicant have planned for all necessary infrastructure to serve the SDLTD.
- Raising the elevation of the SDLTD through development will remove the land from the Coastal High Hazard Area and protect adjacent existing development from storm surge events.
- The SDLTD area is not suited for continuing agricultural use.
- The development of the SDLTD will significantly reduce impacts to the aquifer and Biscayne National Park as compared to the current uses on the site.
- SDLTD will produce a significant economic benefit to the County and approximately 11,000 permanent jobs.

## **There is a Need for the SDLTD.**

The SDLTD represents a generational opportunity to bring a much-needed major employment center to South Dade—a rapidly growing area poised to see a staggering population growth rate of 40 percent or 110,000 new residents by 2040.

Nearly half of the County’s population now lives in the southern portion of the County inclusive of both the South Central and the South Tiers. The South Tier’s rate of population growth will be twice that projected countywide and the number of people added will account for 20 percent of overall County population growth.

Despite recent efforts by the County, the development pattern of South Dade has stubbornly refused to change. Major employment generating uses have remained clustered around Miami International Airport or downtown Miami. Development patterns formed after World War II have left thousands of acres filled with low-density residential subdivisions served by minimal and scattered commercial areas. Eighty-seven (87) percent of the land within the UDB south of SW 8 Street is developed with single-family uses.

As noted in the County’s “2020 Strategic Economic Development Plan for South Dade,” approximately “175,000 residents of South Dade travel outside of the region every day for work. Accommodating a significant percentage of these residents with employment opportunities within South Dade has broad implications for improving mobility and quality of life for residents of the area.” There are 240,500 workers who live in South Dade but 72 percent of them work outside of South Dade.<sup>1</sup>

Even now approximately 65 percent of the people 16 years of age or older who live in the South Tier commute more than 30 minutes to work, 45 percent commute more than 60 minutes, and 10 percent for more than 90 minutes. Workers with limited transportation options either face lengthy transit commutes or simply are excluded from higher quality work in employment centers in the center and north of the County due to lack of access.

South Dade’s workforce is significantly underutilized, with the existing non-residential development “not generating the jobs to support its resident base when compared to other

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<sup>1</sup> “2020 Strategic Economic Development Plan for South Dade,” pg. 19

areas of the County.”<sup>2</sup> In the 2015 to 2019 period, the American Community Survey approximated that the unemployment in the area exceeded 8 percent when the countywide rate was 5.3 percent. The unemployment rate among African Americans was 14.8 percent, compared to a 10.7 percent rate for that cohort countywide.

The combination of these factors has led to quality-of-life issues for South Dade residents, traffic and air quality issues for all County residents, stubborn pockets of poverty where jobs are scarce, and overall depressed wages. The County’s planning efforts, including the creation of zoned “urban centers” along the busway have had limited success in encouraging real job creation in South Dade. The County’s consultants have indicated that “there is a significant imbalance in the residents-to-jobs equation in this part of the corridor, with approximately 326,000 residents to 87,000 employees within a two-mile radius of the busway corridor, (approximately a 4:1 ratio, while throughout the County the ratio is 2:1).”<sup>3</sup>

The development of the SDLTD offers an opportunity to solve these issues by introducing a mix of new and innovative job generating uses to the local area, reversing traditional commuting routes, reducing average trip lengths, and encouraging investment in South Dade in an unprecedented manner.

### **Need for Logistics Land and Supply-Chain Compression.**

As e-commerce firms and retailers have proliferated, the acceptable supply-chain delivery time for ordered goods has been compressed to two days at most and in some cases is being measured in hours. Due to the need for expedited deliveries and to avoid traffic congestion that results in wasted time and increased fuel costs, many businesses currently operating from a single location in North Dade are following the example of FEDEX, UPS and Amazon and are seeking to expand to South Dade so that they can operate more efficiently and cost-effectively. In so doing they are decreasing trip lengths and also reducing the amount of air pollution that they create.

Distribution/logistics centers have two major requirements that set them apart from many older industrial uses: (1) they require direct highway access; and (2) they need to be located on larger sites of at least 10 acres. Additional siting preferences include rectangular shaped properties and adequate spacing from residential areas. As will be demonstrated

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<sup>2</sup> *Id.*

<sup>3</sup> “SMART Plan South Dade Transitway Corridor Land Use Scenario & Visioning Planning Final Report October 2019,” pg. 93

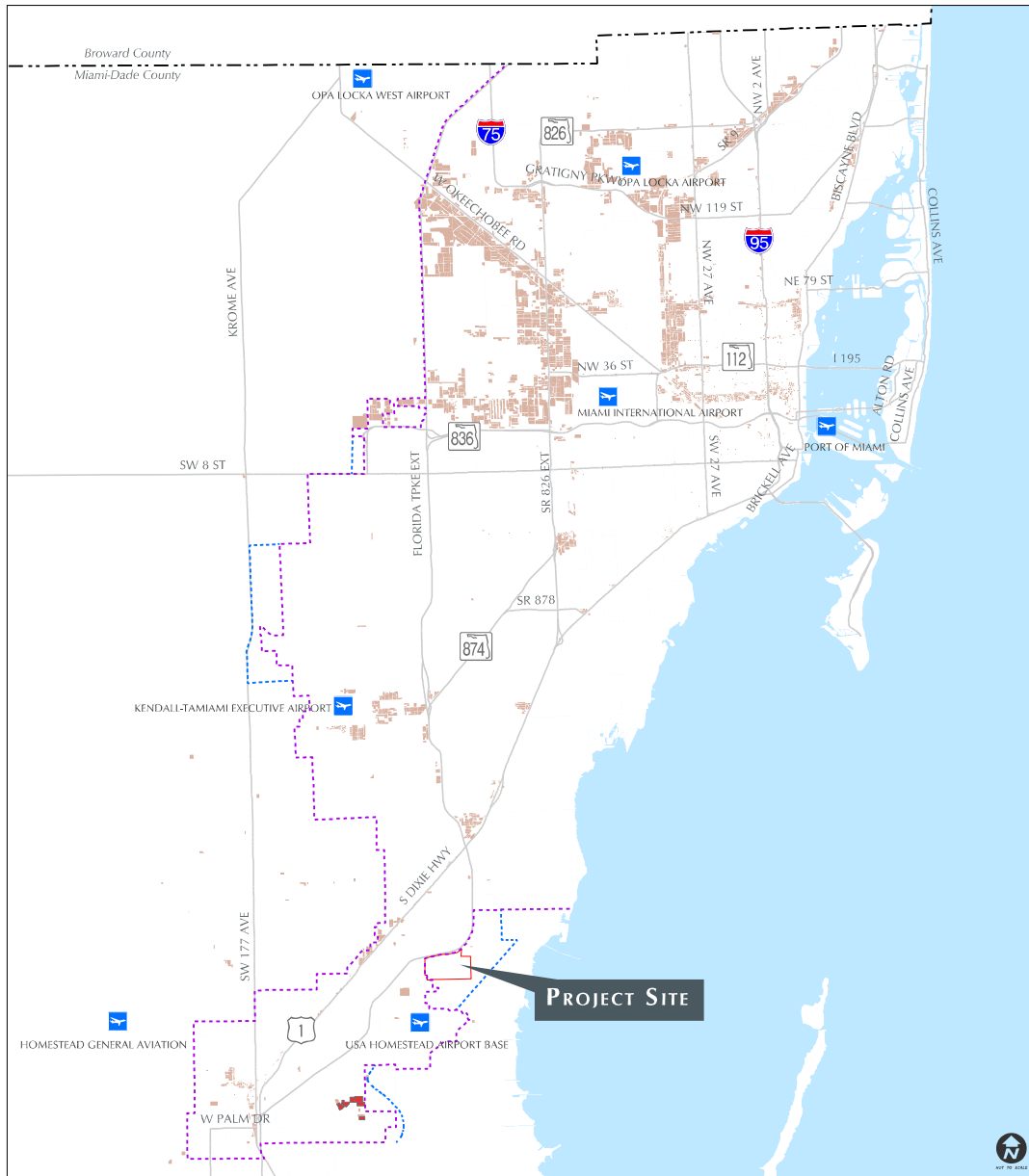
below, there is very limited land in South Dade, outside of the SDLTD, that is available to meet that specific and growing need.

### **Countywide Supply and Demand.**

The Miami Metropolitan Statistical Area has 65 square feet of distribution/logistics space per person, which is the second lowest ratio of space to population among the nation's most populous cities. In contrast, Los Angeles has 105 square feet per person, while Atlanta and Chicago have 123 and 134 square feet per person, respectively. This imbalance between supply and demand has had significant consequences -- reducing warehouse vacancies rates to 4.4 percent.

Assuming a ratio of square feet to population of between 65 and 100, Miami-Dade County will need between 7 and 11 million new square feet of distribution/logistics space to accommodate projected population growth.

Approximately 80 percent of the vacant industrial acres in Miami-Dade County as of December 2020 were in the County's Northern and North-Central Tiers, which is also where all 22 of the County's premiere distribution/logistics center projects are located. This imbalance is dramatically illustrated in the figure below.



Source: Miami-Dade GIS; Adapted by The Curtis Group 2021

**LEGEND**

- Project Site
- Urban Development Boundary
- Industrial Land
- Urban Expansion Area
- Vacant Industrial Land greater than 10 acres

**LOCATION MAP**

SOUTH DADE LOGISTICS AND TECHNOLOGY PARK

### **RER Calculation of Depletion of Available Industrial Land Supply.**

In December 2020, the Research Section of the Department of Regulatory and Economic Resources (“RER”) estimated that there was a total of 13,326.7 industrially designated acres within the UDB including 2,660.7 vacant acres. RER further estimated that 93 acres are absorbed annually, which would result in a depletion year beyond 2040.

According to an analysis done by CBRE, the world’s largest commercial real estate firm, 1,366 of the vacant 2,660 acres in Miami-Dade County are comprised of parcels of less than 10 acres, which means that there were only 1,294 acres that can accommodate modern-day distribution/logistics facilities.<sup>4</sup> CBRE further estimated that over the last 32 years, Miami-Dade County has delivered an average of 2.9 million square feet of new distribution/logistics space annually, which means the parcels comprised of 10 or more acres would be depleted in less than 7 years.

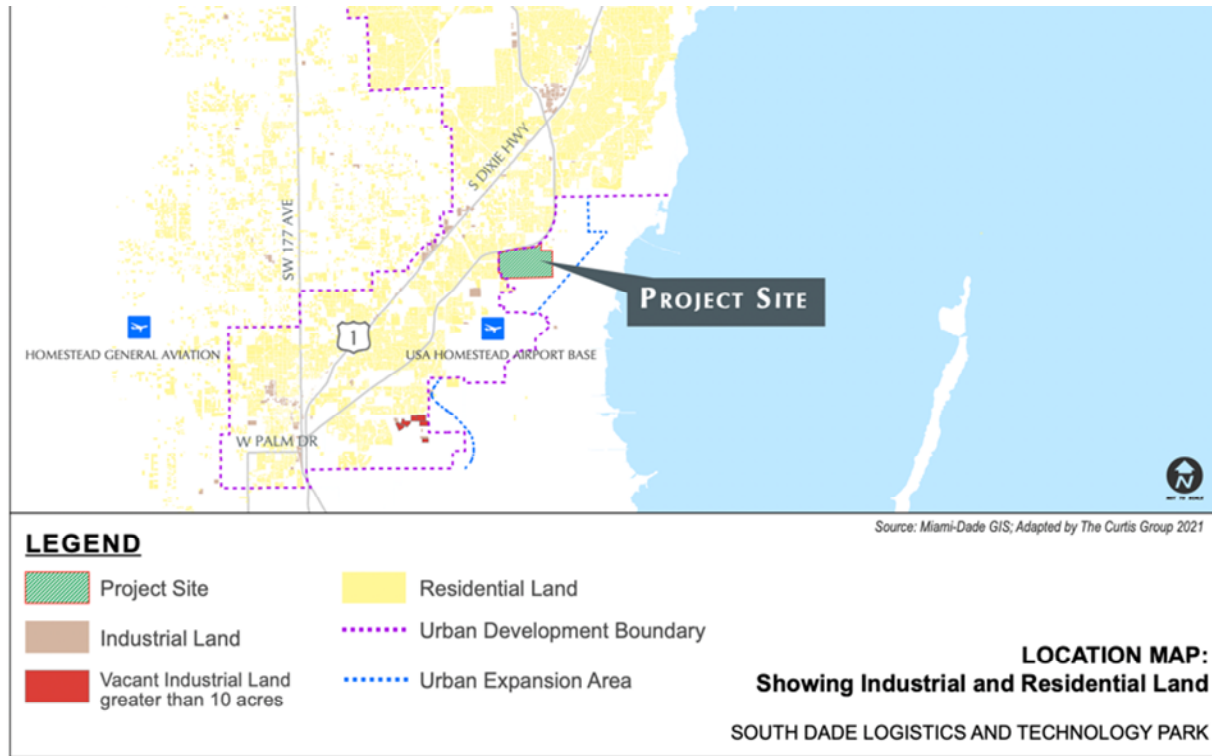
### **Amount and Nature of South Dade Industrial Land Supply.**

Policy LU-8E of the CDMP requires applications requesting amendments to the CDMP Future Land Use Map to “satisfy a deficiency in the Plan map to accommodate projected population or economic growth of the County.”

As permitted by Land Use Policy LU-8F, the SDLTD needs analysis focused on the adequacy of the land supplies in the Southern Planning Tier of Miami-Dade County, i.e., the portion of the County south of SW 184<sup>th</sup> Street which contains Minor Statistical Areas (“MSA”) 7.1, 7.2, 7.3, 7.4 (where the SDLTD site is located), and 7.5.

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<sup>4</sup> Some of the smaller undeveloped industrial sites in the County’s inventory may be better utilized for other purposes, including commercial services or attached single family uses.



**Issues with South Dade Industrial Supply.**

There are currently a total of 547 acres of vacant industrial land within the Southern Tier of Miami-Dade County, inclusive of the 190 acres within or adjacent to the Homestead Park of Commerce. However, there are only 18 parcels that contain 10 or more acres and only 10 that contain 20 or more acres. The parcels of 10 or more acres total approximately 500 acres. The parcels containing 20 or more acres, which are of a size that makes them more useful for modern logistics/distribution use, total approximately 275 acres.

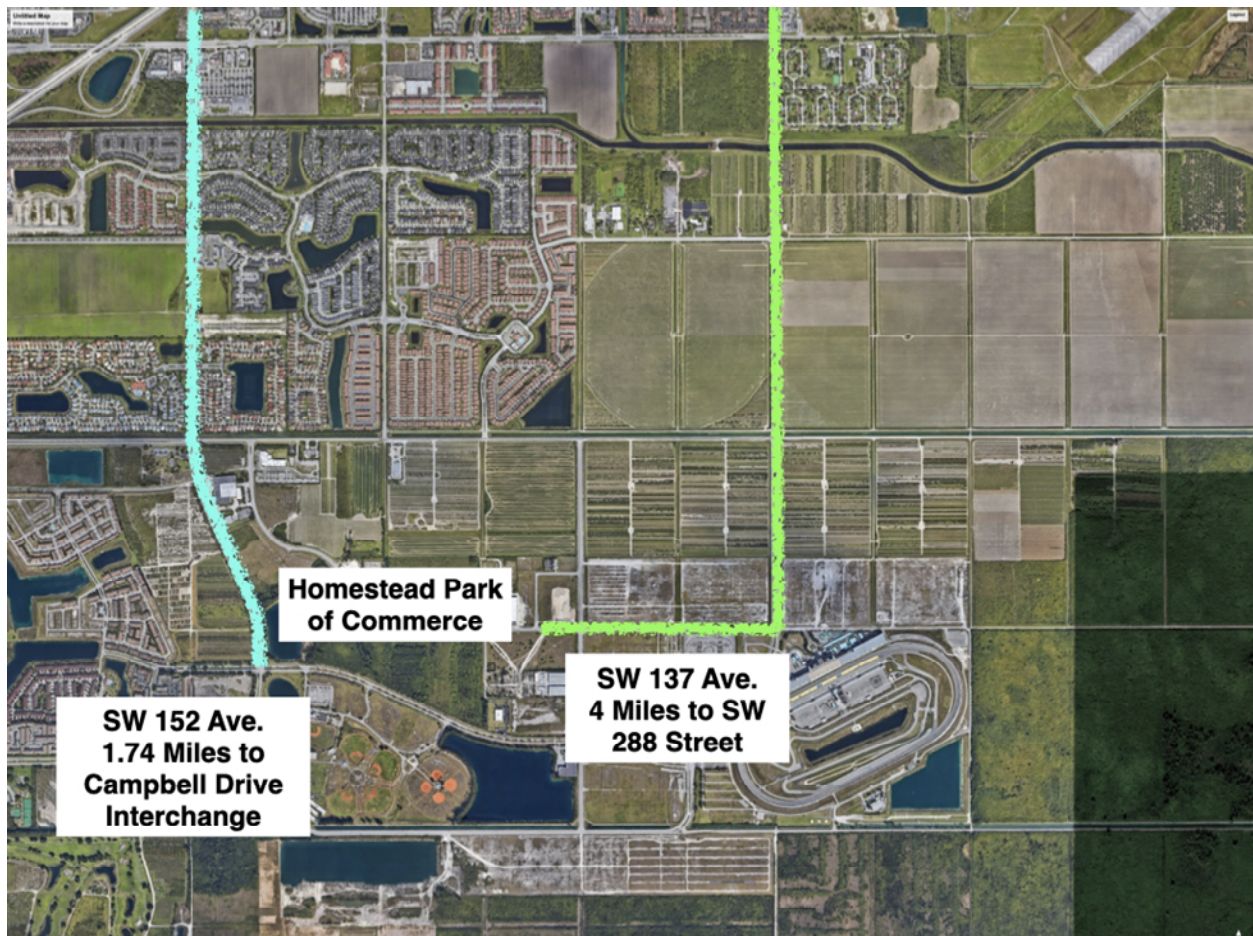
Almost all of the sites above 10 acres in the Southern Tier have issues that limit their utility for large-scale industrial development. The issues with the various tracts are discussed below.

**Issues with Homestead Park of Commerce.**

The only large-scale industrial park south of SW 8<sup>th</sup> Street is the Homestead Park of Commerce (“HPOC”), which was established approximately 25 years ago. Only approximately 40 acres have been absorbed to date by private sector firms. There are currently 190 vacant acres within HPOC and/or parcels that abut the park.



Issues that have limited HPOC's ability to attract occupants include: 1) it is not immediately accessible from major highways, requiring truck traffic to utilize streets within residential neighborhoods; and 2) portions of the HPOC are in Accident Protection Zone 2 ("APZ 2") of the Homestead Air Reserve Base, which imposes limits on the number of people that can be employed in those areas.



These factors have significantly impacted the viability of HPOC. The access issues with HPOC alone make it a non-starter for modern distribution/logistics center projects. In contrast, the SDLTD is located at an existing full interchange to the Homestead Extension of Florida's Turnpike ("HEFT") – the only large-scale industrial location available with direct HEFT access south of SW 8 Street. A summary of the development surrounding South Dade HEFT interchanges is provided in the Appendix to this white paper.

### **Issues with Other Larger Tracts.**

The remaining supply outside of the HPOC has other significant issues.

Parcels with Existing Approvals. Seven parcels consisting of a total of 288 acres are either currently being developed, are the subject of approved development plans, or are the subject of development plans that are being reviewed by the appropriate governmental jurisdiction. It is therefore unlikely that these sites will remain undeveloped. Further, the development of these parcels will involve a total of 325 acres when the use of contiguous vacant parcels is considered to support the proposed or approved development.

<b>Parcels Under Construction or with Approved or Pending Plans</b>	
Folio	Acres
30-7901-000-0120	105
30-6935-000-0061	46 (under construction)
30-6935-000-0400	29 (under construction)
10-7921-011-0040	37
10-7927-001-0065	34
30-6923-000-0530	23
30-6923-000-0532	14
<b>Total</b>	<b>288</b>

Parcels Within HARB APZs. Six (6) parcels comprised of a total of 110 acres are within one of the two Accident Protection Zones (“APZs”) of the HARB. Being located within a APZ strictly limits the nature of the permitted use of those tracts, making it unlikely that any would be developable with a large employer.

<b>Parcels within HARB APZs</b>	
Folio	Acres
10-7922-001-0110	29
10-7922-001-0160	20
10-7922-001-0140	10
10-7921-011-0025	23
10-7922-001-0120	18
10-7921-011-0080	11
<b>Total</b>	<b>111</b>

Irregularly Shaped Parcels. There are six parcels, totaling approximately 226 acres, that are irregularly shaped, which makes them a poor candidate for large-scale uses, especially logistics uses, which require a site to be able to accommodate a very specific class of

building. Some of these sites are owned by the County, within an APZ, and/or have approved or pending plans of development.

<b>Irregularly Shaped Parcels</b>	
Folio	Acres
30-7901-000-0120	105
10-7921-011-0040	37
30-7901-000-0095	25 (lake covers +50% of land parcel)
10-7921-011-0025	23
10-7921-011-0060	19
30-7902-000-0021	17
<b>Total</b>	<b>226</b>

Parcels Abutting Residential. Six of the available parcels exceeding ten acres, totaling approximately 168 acres, immediately abut or are in close proximity to residential uses. That proximity will make it very unlikely that large scale industrial use will be permitted, or appropriate, for those sites.<sup>5</sup> Some of these sites are also owned by the County, within an APZ, have approved or pending plans of development, and/or are irregularly shaped.

<b>Parcels Close to Residential Uses</b>	
Folio	Acres
30-6935-000-0061	46 (under construction)
30-6935-000-0400	29 (under construction)
30-7902-000-0040	30
10-7922-001-0110	29
10-7922-001-0120	17
30-7902-000-0021	17
<b>Total</b>	<b>168</b>

### **Additional Supply is Needed.**

In sum, RER staff's calculation of available industrial supply fails to take into account: (1) the unique requirements of logistic/distribution uses; (2) the market trends that have greatly accelerated depletion of available larger industrial tracts; (3) the paucity of overall

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<sup>5</sup> While the SDLTD is located in close proximity to residential areas, the district is cordoned off from the residential uses by significant buffers, including the HEFT and C-102 canal, which frame the north and north-west of the district. Given the ready HEFT access, truck traffic will have no reason to travel through adjacent neighborhoods, which is a major issue with 168 acres of County's listed available supply.

industrial land supply in South Dade; and (4) the limitations of the available South Dade supply that make its development with modern employment centers unlikely. Once the limiting factors of size, existing or pending development approvals, location within an APZ, irregular shape, and proximity to residential uses are applied, there are approximately thirty-one acres of viable industrial supply. Even at the County’s assumed depletion rate of 5.0 acres per year in the South Tier<sup>6</sup>, that supply would be exhausted in less than 10 years.

<b>Summary of Issues With Southern Tier Supply</b>	
All Vacant Industrial Land	547 acres
Remove Parcels Less than 10 Acres	-174 acres
Remove Parcels With Approved or Pending Plans	-288 acres
Remove Irregular Parcels (Not within APZ or With Approved or Pending Plans)	-25 acres
Remove Parcels Close to Residential (Not Irregular, within APZ, or With Approved or Pending Plans)	-29 acres
<b>Total Remaining Developable Industrial Land</b>	<b>31 acres</b>

The SDLTD site is uniquely situated to meet the demands of modern industrial development in South Dade. The SDLTD site is outside of any of the Homestead Air Reserve Base Accident Protection Zones, which will allow the uses on the site to operate without limitations on employees.<sup>7</sup> The SDLTD land can be subdivided into the larger tracts needed for modern logistics uses. The location of the SDLTD at an existing full HEFT interchange will allow direct access for truck traffic, without the need to drive on local streets or through residential neighborhoods. There are simply no other locations in all of South Dade that are better suited to creating the job center that South Dade needs.

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<sup>6</sup> County *Draft Urban Expansion Area Report* (March 10, 2021), pg. 5.

<sup>7</sup> As provided in the Appendix to this white paper, the Homestead Air Reserve Base has formally issued a determination that it has no objection to the SDLTD development.

**Development of the SDLTD is consistent with the County's Redevelopment and In-fill Goals.**

Policy LU-1C of the CDMP's Land Use Element provides that "Miami-Dade County shall give priority to infill development on vacant sites in currently urbanized areas, and redevelopment of substandard or underdeveloped environmentally suitable urban areas contiguous to existing urban development where all necessary urban services and facilities are projected to have capacity to accommodate additional demand." (emphasis added)

As explained below, all necessary urban services, including roads, water and sewer, and transit are either currently available to the SDLTD or will be extended to the SDLTD at the expense of the developers. There are no similarly situated areas within the UDB that can accommodate the logistic/distribution uses contemplated for the SDLTD. Given the lack of suitable sites within the existing UDB, it would be consistent with Policy LU-1C to amend the boundary to accommodate the SDLTD. The SDLTD's ownership pattern, where a few owners control the land, favors the proposed development of logistics/distribution uses, which require large parcels of land. Moreover, unlike many existing and potential industrial areas, the District is nowhere near a wellfield protection area.





That development pattern is consistent with the language used in Florida Statute 163.3177(6)(a)(9)(a), which defines a sprawl condition as occurring where “substantial areas of the jurisdiction [are permitted] to develop as low-intensity, low-density, or single-use development or uses” or where a local government “fails to encourage a functional mix of uses.” South Dade’s issues of long commute times and chronic underemployment are a direct result of the sprawl condition that has left South Dade largely bereft of employment centers like the SDLTD.

Of equal relevance to the sprawl “factors” of Florida Statute 163.3177(6)(a)(9)(a) are the statutory standards of 163.3177(6)(a)(9)(b), which describe a plan amendment that does not create sprawl, but instead discourages or remedies it. The SDLTD amendment is consistent with several of these criteria, including:

- a) *Directs or locates economic growth and associated land development to geographic areas of the community in a manner that does not have an adverse impact on and protects natural resources and ecosystems.*

As explained below, the SDLTD development will markedly improve water use, drainage, saltwater intrusion, and pollutant discharge as compared to the status quo.

- b) *Promotes the efficient and cost-effective provision or extension of public infrastructure and services.*

The SDLTD site is currently served by infrastructure and any and all extensions will be solely at the cost of the developers. It immediately abuts and has direct access to the HEFT, the major highway serving South Dade.

- c) *Promotes conservation of water and energy.*

The SDLTD development will massively reduce water consumption on the site as compared to the existing use. By providing jobs within close proximity of the South Dade residential areas, commuting times and trip lengths, along with fuel consumption and exhaust, will be reduced.

- d) *Preserves open space and natural lands and provides for public open space and recreation needs.*

The developers of the SDLTD have agreed to coordinate with Miami-Dade County Parks, Recreation and Open Space Department to help the County implement long-held plans for recreational uses along the C-102 canal.

- e) *Creates a balance of land uses based upon demands of the residential population for the nonresidential needs of an area.*

The SDLTD will help to create the long missing balance of the land uses in South Dade, providing a significant employment center for an area that is characterized by “low-intensity, low-density, single-use development” and has lacked adequate jobs.<sup>8</sup>

- f) *Provides uses, densities, and intensities of use and urban form that would remediate an existing or planned development pattern in the vicinity that constitutes sprawl or if it provides for an innovative development pattern such as transit-oriented developments or new towns as defined in s. 163.3164.*

The SDLTD will help remediate the current sprawl condition created over the last half century in South Dade.

While the SDLTD will require the movement of the County’s UDB, the movement of the line will remediate the existing sprawl condition. There are no other areas in South Dade that offer such a clear opportunity to reverse the pernicious impacts of low-density residential sprawl by introducing a significant employment generator.

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<sup>8</sup> The existing sprawl condition extends to the adjacent area east of the SDLTD outside the UDB, where hundreds of single-family homes are under construction under a plat that dates back to the 1920’s.



**The SDLTD application is consistent with the requirements of Policy LU-8H of the Land Use Element of the CDMP.**

Policy LU-8H of the CDMP Land Use Element requires an applicant seeking to amend the County's UDB to file a concurrent zoning application implementing the amendment. The Applicant and Co-Applicant have filed the required zoning applications. The administration has raised concerns regarding the consistency of the applications with the following portions of Policy LU-8H. Below each criterion will be a response and/or reference to the portion(s) of this white paper or exhibit in the attached Appendix discussing the relevant issue:

- d. Where multiple project phases are proposed, include a phasing schedule that demonstrates that the minimum density and FAR outlined in subsections (b) and (c) will be accomplished in the first phase of development in a recordable instrument in favor of the County; and*

A recordable Development Agreement pursuant to Florida Statute Section 163 has been filed with the concurrent CDMP and zoning applications. The phasing provisions can be included in the declarations of restrictions proffered with the CDMP amendment application. The Phase III portion of the SDLTD will be governed by the language of the SDLTD Special District, which governs commencement of construction and requires each portion of that land independently to meet the FAR minimum.

- e. Demonstrate that the project will be served by utility water and sewer service and that adequate public facilities and infrastructure (including water, sewer, roadways, mass transit, solid waste, flood protection, parks and schools) are available or, where not available, ensure the provision of such improvements through a recordable instrument in favor of the County; and*

The Applicant and Co-Applicant have agreed to provide any and all improvements necessary to accommodate the SDLTD. See the sections of this white paper related to traffic and water and sewer infrastructure.

- h. Demonstrate that the proposed development will utilize sound urban design principles contained in the County's Urban Design manual or other document approved by action of the Board of County Commissioners and will provide for compatibility and connectivity with adjacent urban land uses; and*

While industrial development is not generally reviewed for consistency with the County's Urban Design Manual, the SDLTD is proposing pedestrian, bicycle and other access in a manner consistent with County policies.

- i. *Incorporate bicycle and pedestrian accessibility throughout the development with connections to adjacent areas, where appropriate; and*

Pedestrian and bicycle access will be incorporated throughout the SDLTD, with SW 107<sup>th</sup> and 112<sup>th</sup> Avenues and SW 268<sup>th</sup> Street designed as complete streets providing multi-modal transportation opportunities.

- k. *Provide a minimum of 15% of the gross area as open space; and*

A minimum of 15 percent of the gross area of each Phase of the SDLTD will be provided as open space. The first two phases of the development include this requirement in their proffered covenants. Phase III will be governed by the express language in the CDMP text to be implemented at zoning.

- l. *Protect environmentally-sensitive areas to the maximum extent feasible including consideration of impacts to threatened and endangered species; and*

See the discussions in this white paper regarding environmental impacts, which demonstrate that the SDLTD will significantly reduce water use and pollution.

- m. *Demonstrate that the proposed development will have a positive net fiscal impact to Miami-Dade County; and*

See the fiscal benefits discussion in this white paper.

- o. *Include commitments to ensure that the proposed development will be served by mass transit with at least 20 minute peak hour headways or include a plan to provide such service; and*

The existing transit service to the SDLTD meets this requirement. Given the significant job generation and associated transit usage anticipated in the SDLTD, we expect that the County will continue to retain the existing service levels. In addition, the Applicant and Co-Applicant are working with the staff of DTPW to enhance the ease of access to the existing transit service by providing for additional bus stops as well as the addition of shelters from inclement weather at the existing bus stops.

- p. Include commitments to ensure that the proposed development will not cause a roadway to exceed its adopted level of service standard or further erode the level of service on a failing roadway;*

See the traffic discussion in this white paper. The Applicant and Co-Applicant will pay their respective proportionate share of impacts to roadways that are projected to exceed capacity with the development's impacts as contemplated under Section 163.3180, Florida Statutes.

- q. Provide for the preservation of agricultural land commensurate with the impacts of the application on agriculturally-designated land which may include participation in a Transfer of Development Rights program, Purchase of Development Rights program or other similar effort; however, notwithstanding anything in this paragraph to the contrary, in no event shall properties within the Urban Expansion Area be obligated to preserve agricultural land at a 1-to-1 ratio.*

The Applicant and Co-Applicant will participate in the County's uniform program, if and when applicable, as part of the concurrent zoning applications for the first two phases of the SDLTD development. The third phase of the SDLTD will comply at the time of zoning under the terms of the language of the Special District.



## **Roadway Conditions.**

The SDLTD team has conducted multiple analyses of the impact of the development on local roadways. Pursuant to the County's methodology requirements, SDLTD's consultants conducted analyses of both short-term (2023) and long term (2045) roadway conditions assuming the development of the project.

The results of this analysis are included in the submittals to the SDLTD application, with a summary below.

### **Short Term Analysis**

Location	Development Significant Impact?	Level of Service Without Project	Level of Service With Project	Project Causing Failure?
<b>SW 112 Ave n/o SW 232 Street</b>	<b>Yes</b>	<b>D</b>	<b>F</b>	<b>Yes</b>
SW 248 Street w/o SW 127 Avenue	Yes	F	F	No
US 1 s/o SW 248 Street	No	F	F	No

### **Long Term Analysis**

Location	Development Significant Impact?	Level of Service Without Project	Level of Service With Project	Project Causing Failure?
US 1 at SW 216 Street	No	F	F	No
<b>SW 112 Ave from SW 216 Street to SW 232 Street</b>	<b>Yes</b>	<b>C</b>	<b>F</b>	<b>Yes</b>
SW 127 Ave from SW 216 Street to SW 232 Street	Yes	F	F	No
SW 157 Ave from SW 216	No	F	F	No

Street to SW 272 Street				
US 1 from SW 248 Street to SW 268 Street and SW 232 Street to SW 117 Avenue	No	F	F	No

There are several area roadway segments that are already predicted to fail over the long term -- even without the SDLTD. The SDLTD development will be responsible for only one failure -- the segment of SW 112<sup>th</sup> Avenue between SW 216<sup>th</sup> Street and SW 232<sup>nd</sup> Streets.

**Proportionate Share.**

As contemplated by Section 163.3180 of the Florida Statutes, the developers of Phase I and Phase II of the SDLTD have agreed to pay the proportionate share of those right of way segments that are significantly impacted by the development and will fail due to the SDLTD development. The proportionate share agreement, to be memorialized in the preferred Development Agreement would cover the following right of way segments.

<b>Right of Way Segments Subject to Proportionate Share Payment</b>
SW 112 Ave n/o SW 232 Street
SW 112 Ave from SW 216 Street to SW 232 Street

## **The SDLTD Development Will Protect Existing and New Infrastructure.**

As a largely unimproved area, the SDLTD site is currently located in the Coastal High Hazard Area ("CHHA"). The location of the property within the CHHA risks the inundation of existing infrastructure as part of Category 1 hurricane strike. Policy CM-9A of the County's CDMP discourages development within the CHHA. Policy CM-9E prohibits new non-water dependent facilities that use or handle more than 55 gallons of hazardous wastes or materials per year. Policy CM-9F provides that public expenditures should not be used to oversize "potable water and sanitary sewer facilities . . . to subsidize additional development" in the CHHA.

While the SDLTD may be in the CHHA now as largely open land, the site will not remain within the CHHA. The development plan for the SDLTD will require land within the District to be raised during the development process. Paved areas around proposed buildings will be raised to an average elevation of 8.75 feet NGVD, over five feet above current elevation. Finished floors will be raised even higher than that -- to 12 feet NGVD or almost nine feet over current elevation.

The change in elevation will remove the SDLTD from the CHHA. Any necessary water and sewer improvements will be solely at the expense of the SDLTD developers and no oversizing to accommodate development within the development is proposed. No public funds will be used to make the necessary infrastructure improvements. Though existing, SW 112 Avenue, SW 268 Street and SW 107 Avenue will be significantly improved at the expense of the Applicant, the Co-Applicant and the future developers of Phase III through the introduction of modern stormwater management measures. Moreover, by prohibiting residential development within the District, other than as an interim grandfathered use within Phase III, the development of the District will remove a potential 48,980 gallons of sewage per day that would otherwise be disposed through septic tank systems that are particularly vulnerable to storm surges and increases in water levels.<sup>10</sup> Accordingly, the

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<sup>10</sup> The area of 793 acres may be subdivided under the current designation into 158 homesites of 5 acres each for the construction of single-family homes. Under Chapter 24 of the Miami-Dade County Code, depending on the size of the home, each single-family home will generate from 210 gallons per day ("GPD") (if less than 3,001 square feet), 310 GPD (if between 3,001 and 5,000 square feet) and 510 GPD (if more than 5,000 square feet). Given the minimum required lot size of 5 acres, each lot could support the construction of homes well in excess of 5,000 square feet. For purposes of our analysis, however, we have conservatively assumed that each home will generate 310 GPD. The impact of existing pollutant loads from the current uses in the SDLTD is discussed below and within Exhibit E to this whitepaper.

SDLTD site will remain consistent with the policies related to development within the CHHA.

### **Upgrades to Existing and New Infrastructure.**

The SDLTD will utilize existing and new roadway and water and sewer infrastructure. As part of the construction of the project, the SDLTD developers will ensure that the infrastructure is designed (or improved where existing) to meet the County's current standards. The development of the SDLTD will therefore improve rather than imperil existing County infrastructure.

Roadway Drainage. The SDLTD will incorporate the following existing roadways: SW 112<sup>th</sup> Avenue, SW 107<sup>th</sup> Avenue, SW 268<sup>th</sup> Street, and SW 256<sup>th</sup> Street. As part of the development, the SDLTD will create the following new roadways: SW 117<sup>th</sup> Avenue north of the C- 102 Canal and the extension of SW 256<sup>th</sup> Street, SW 261<sup>st</sup> Street and SW 264<sup>th</sup> Street (west of SW 112<sup>th</sup> Avenue only).

The roadway designs will be consistent with Miami-Dade County requirements protecting the roadway from the 10-year design storm. Exfiltration trenches provided for the existing and proposed roadways will be designed to retain the runoff generated by the 10-year design storm. Where existing roadways do not include the minimum length of trench, the SDLTD will upgrade the roads to current County standards. The new exfiltration trenches will also serve to provide the necessary water quality treatment for the roadway areas, which is currently lacking. See below and Exhibit E for a full discussion of the significant reduction in pollutant discharge that will result from the SDLTD development.

Water and Sewer. The SDTLD's water and sewer infrastructure will be designed and constructed in accordance with Miami-Dade Water and Sewer Department ("WASD") requirements. The minimum elevation of all sanitary pump stations associated with the development will be elevated to meet FEMA and WASD requirements. The wet well rim elevations and all control panels will be at minimum elevation of 10.00 NGVD, which depending on the final location of the pump stations will be between 3.00 to 1.00 foot above FEMA base flood elevation, and 5.50 to 6.50 feet above current elevations.



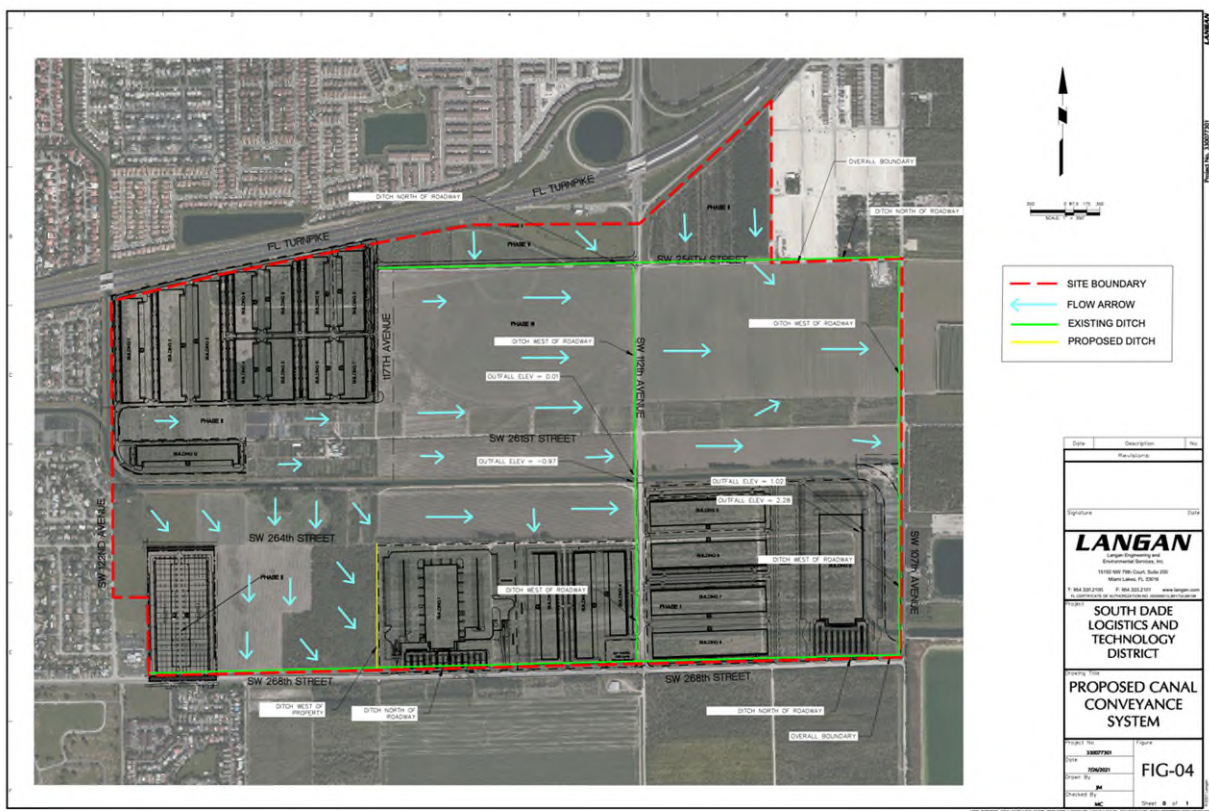
### **No Adjacent Agricultural Drainage will be Impacted by the SDLTD.**

The SDLTD development will be designed so that each component tract retains all the runoff from a 100-year, 3-day storm event – meeting and exceeding typical County stormwater retention requirements. County Division of Environmental Resources Management (DERM) staff have raised concerns associated with the impact of the development on on-going agricultural activities in adjacent lands. Staff is concerned that the raising of the SDLTD land and the introduction of modern stormwater management may have impacts on land both within and outside the SDLTD. If adjacent land, for example, relied on portions of the SDLTD for drainage (not uncommon for older agricultural tracts), the development of the SDLTD could cause flooding of these undeveloped sites. The SDLTD team has completed a comprehensive analysis of the impact of the project and has determined that, due to existing drainage patterns and agreed-to improvements by the developers, no flows will be negatively impacted by the SDLTD development. A full analysis is attached as Exhibit E of the Appendix to this white paper.

Land Outside the SDLTD. The SDLTD development will be designed to meet current County stormwater management criteria. Each development site will include a perimeter berm set at the calculated 100-year 3-day storm event.

As shown on the figure below, the SDLTD development will not result in drainage issues for properties outside of the district. The land abutting the development to the east and south of the SDLTD are separated by a County roadway and ditch system, which divorces them hydraulically from the proposed development. The areas to the north are hydraulically separated by the Florida Turnpike. Finally, the single-family residences to the west of the SDLTD drain to the existing roadway network and are not hydraulically connected to the SDLTD.





**The SDLTD application is Consistent with the CDMP Policies Related to Agricultural Land and Uses and the SDLTD Land Is Poorly Suited for Future Agricultural Use.**

The requested amendment to the CDMP FLUM to re-designate the SDLTD site is consistent with and satisfies the following CDMP Goals, Objectives, and Policies:

*GOAL: PROVIDE THE BEST POSSIBLE DISTRIBUTION OF LAND USE AND SERVICES TO MEET THE PHYSICAL, SOCIAL, CULTURAL, HEALTH AND ECONOMIC NEEDS OF THE PRESENT AND FUTURE POPULATIONS IN A TIMELY AND EFFICIENT MANNER THAT WILL MAINTAIN OR IMPROVE THE QUALITY OF THE NATURAL AND MAN-MADE ENVIRONMENT AND AMENITIES, AND PRESERVE MIAMI-DADE COUNTY'S UNIQUE AGRICULTURAL LANDS.*

The SDLTD Property is directly contiguous to the UDB and is located within an Urban Expansion Area ("UEA") with residential uses directly west and east. The requested re-designation meets the physical and economic needs of the area and addresses the need for additional employment opportunities for both present and future populations. As noted below, the suitability of the land within the SDLTD area for continued agricultural

use is marginal at best and is at risk from a variety of factors including saltwater intrusion, saltwater contamination from storm surges, and decreased drawdown Agricultural production is not the most appropriate, or highest and best use, for the SDLTD area.

*POLICY LU-10: Miami-Dade County shall seek to prevent discontinuous, scattered development at the urban fringe in the Agriculture Areas outside the Urban Development Boundary, through its CDMP amendment process, regulatory and capital improvements programs and intergovernmental coordination activities.*

Re-designation of the existing Agriculture land use in the SDLTD to the Special District satisfies Policy LU-10 by allowing for continuous, orderly and phased development along the UDB within the UEA. Indeed, the SDLTD Property is currently served or can be served by the necessary public services and facilities without cost to the public.

By way of example, the SDLTD is already well served by public transit, with accessible water and sewer lines, and is directly accessible to the regional roadway network through an existing HEFT interchange to the north end of the District. SW 112<sup>th</sup> Avenue and SW 268<sup>th</sup> Street are major 4 lane streets that already easily connect the SDLTD to the residential communities of South Dade, such as Goulds, Perrine, Naranja, and Homestead. The SDLTD Property, as described below, remains agricultural in name only.

*POLICY LU-1P: While continuing to protect and promote agriculture as a viable economic activity in the County, Miami-Dade County shall explore and may authorize alternative land uses in the South Dade agricultural area which would be compatible with agricultural activities and associated rural residential uses, and which would promote ecotourism and agritourism related to the area's agricultural and natural resource base including Everglades and Biscayne National Parks.*

Agriculture is not a long-term viable activity within the SDLTD site. Nonetheless, as proposed, the SDLTD provides for phased development. Phase III provides for "[a]griculture uses, uses ancillary to and directly supportive of agriculture ... and farm residences" consistent with Policy LU-1P, for as long as the property owners desire to continue agricultural operations. As discussed in this whitepaper and Exhibit E, existing drainage for agricultural uses will be maintained as part of the phased development.

The SDLTD is also not well-suited for agri-tourism activities. For instance, due to the nature of the soils, the area is not suited for fruit production that can be used in the production of wine, such as the on-going wine production in the Redland, and is too distant to attractions and parks, such as the Everglades National Park.



*POLICY LU-1R: Miami-Dade County shall take steps to reserve the amount of land necessary to maintain an economically viable agricultural industry. Miami-Dade County shall adopt and implement a transfer of developments rights (TDR) program to preserve agricultural land that will be supplemented by a purchase of development rights program to preserve agricultural land and environmentally sensitive property.*

There are approximately 64,287 acres, including the SDLTD Property, identified as *Farm-land of Unique Importance* by the U.S. Department of Agriculture in the areas with "Agriculture" designations on the CDMP Land Use Plan Map.<sup>11</sup>

As proposed, the 793.93 gross acre SDLTD area represents just 0.01 percent of the total identified Farmland of Unique Importance in the County.<sup>12</sup> Thus, the removal of the SDLTD Property will not significantly decrease the agricultural lands available to support a viable agricultural industry.

*LU-1S. The Miami-Dade County Strategic Plan shall be consistent with the Comprehensive Development Master Plan (CDMP). The Miami-Dade County Strategic Plan includes Countywide community goals, strategies and key outcomes for Miami-Dade County government. Key outcomes of the Strategic Plan that are relevant to the Land Use element of the CDMP include increased urban infill development and urban center development, protection of viable agriculture and environmentally-sensitive land, reduced flooding, improved infrastructure and redevelopment to attract businesses, availability of high quality green space throughout the County, and development of mixed-use, multi-modal, well designed, and sustainable communities.*

The SDLTD area no longer contains viable agricultural land. For reasons unrelated to land use policy but directly related to the topography of the area, environmental conditions, and macroeconomic market forces, the parcels within the SDLTD Property lie fallow most of the year and yield little, if any, by way of agricultural production.

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<sup>11</sup> Miami-Dade County, *Draft Urban Area Expansion Report* (Mar. 2021). pg. 29 (noting the SDLTD Property is included in Figure 10 "Farmland of Unique Importance").

<sup>12</sup> There are 78,543 acres of farms in Miami-Dade County, which consists primarily of agricultural land used for crops, pasture or grazing, as of 2017. United States Department of Agriculture, National Agricultural Statistics Service, *2017 Census by State – Florida*, Table 1.

The area is largely characterized by poorly drained marl soils which are not capable of supporting much vegetable production (other than a very limited amount of sweet corn during four months of every year), no fruit production (which require well drained soils) or plant nurseries (which would require the filling of the land to support vehicles and equipment).<sup>13</sup> Only a handful of parcels in the SDLTD Property are used for field grown trees. Whatever little tree production remains in the area (as well as in the rest of the County) is largely being replaced by tree production in containers as they are easier to transport.

By contrast, while the SDLTD Property is no longer viable for agricultural production, it is directly served by a HEFT interchange and transit with 20-minute headways and, as such, ideally suited to attract businesses to create a truly viable and stable employment center in South Dade. Indeed, the re-designation of the SDLTD Property is directly supportive of several Economic Development Goals and Policies in the Strategic Plan, while having an immaterial impact on the viability of agricultural production, including: the promotion and support of a diverse mix of industries vital to growing the economy, the expansion of job training opportunities aligned with the needs of the local economy, and the promotion of development in distressed communities to ensure their long term vitality.

*POLICY LU-4A: When evaluating compatibility among proximate land uses, the County shall consider such factors as noise, lighting, shadows, glare, vibration, odor, runoff, access, traffic, parking, height, bulk, scale of architectural elements, landscaping, hours of operation, buffering, and safety, as applicable.*

The SDLTD Property is located south, east, and west of existing suburban and exurban residential development. As noted by the County in the draft "*Urban Area Expansion Re-*

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<sup>13</sup> University of Florida Institute of Food and Agricultural Sciences, *Miami-Dade County Agricultural Land Retention Study: Summary and Recommendations Volume 1* (2002), pg. 17 ("Container nurseries require land that is level, compacted and well drained. Most are located on rock land. They use containers of various sizes, some of which are large enough to accommodate specimens as large or almost as large as those produced in field nurseries.")

port" released in March 2021, "conflicts occur where agricultural activities occur near developed areas."<sup>14</sup> Such conflicts include "pesticide spray drift, odor, noise, and farm traffic."<sup>15</sup> The requested FLUM amendment is consistent with Policy LU-4A because it reduces such potential nuisances next to residential development among proximate land uses.

*POLICY LU-8E: Applications requesting amendments to the CDMP Land Use Plan map shall be evaluated for consistency with the Goals, Objectives and Policies of all Elements, other timely issues, and in particular the extent to which the proposal, if approved, would:*

*i) Satisfy a deficiency in the Plan map to accommodate projected population or economic growth of the County.*

As proposed, the requested SDLTD amendments will better accommodate the projected population and economic growth in the County by reallocating underutilized agricultural lands to allow for development of a vibrant and dynamic commercial logistics hub in close proximity to both a substantial customer and employment base.

*POLICY LU-8G: When considering land areas to add to the UDB, after demonstrating that a need exists, in accordance with the foregoing Policy LU-8F:*

*ii) The following areas should be avoided:*

*2) Land designated Agriculture on the Land Use Plan map, except where located in designated Urban Expansion Areas (UEAs);*

*iii) The following areas shall be given priority for inclusion, subject to conformance with Policy LU-8F and the foregoing provision of this policy:*

*b) Land within the UEAs and contiguous to the UDB.*

The proposed amendment satisfies Policy LU-8G(ii)(2) and (iii)(b), as it is located contiguous to the UDB within the UEA.

*POLICY LU-8J: By no later than the time to file an application in the May 2021 CDMP Amendment Cycle to amend the Urban Expansion Areas (UEA), Miami-Dade County shall*

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<sup>14</sup> Draft Urban Area Expansion Report (Mar. 2021), pg. at 33.

<sup>15</sup> *Id.*

*complete a study of (i) additional areas that may be identified as urban expansion areas, with a goal of replacing the 1,993 acres that were proposed for removal in Application No. 5 of the Evaluation and Appraisal Report amendments in the May 2019 CDMP Amendment Cycle, and (ii) potential additional uses that would be appropriate for the urban expansion areas, particularly near the Homestead Air Reserve Base. A draft of this study shall be made available for review by the public by March 15, 2021.*

As discussed below, the re-designation of the SDLTD Property from "Agriculture" to "Special District" is supported by the draft UEA Study, and therefore consistent with Policy LU-8J.

**The SDLTD's Current Location in the AE Flood Zone Supports Shifting Away from Agricultural Uses on the SDLTD Property.**

The current and future effects of sea level rise, flooding, and saltwater intrusion support the re-designation and development of the SDLTD Property at higher elevations. Agricultural uses are negatively impacted by sea level rise and saltwater intrusion because of compromised seasonal groundwater drawdown, loss of root zone due to rising groundwater, increased costs and the potential for the loss of crop insurance coverage, and more.<sup>16</sup> As noted by the County in its September 2020 report, entitled "Sea Level Rise Impact on the Agricultural Community in Miami-Dade County", agricultural lands east of U.S. 1, which includes the SDLTD, will be negatively affected by sea level rise and may experience salt water intrusion and rising ground water levels.<sup>17</sup>

As South Florida and the County adapt to sea level rise and invest in resiliency infrastructure and mitigation measures, strategic future land use planning should ensure the long-term viability of a diversity of uses in the region and continue to propel the County's economic growth. The re-designation of agricultural areas vulnerable to sea level rise and concentrated near existing non-agricultural and urban uses, such as the SDLTD Property, exemplifies sophisticated future land use planning and recognizes agricultural uses are at an enhanced risk to saltwater intrusion and flooding.

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<sup>16</sup> Miami-Dade County, *Sea Level Rise Impact on the Agricultural Community in Miami-Dade County* (Sept. 2020), pg.12

<sup>17</sup> *Id.* at 3.



At its current elevation, the SDLTD area is located in the AE Flood Zone, according to the Federal Emergency Management Agency's ("FEMA's") flood hazard maps reflecting current flood risks for Miami-Dade County. The AE Flood Zone correlates to "moderate to high flooding risk" corresponding to flood depths greater than three (3) feet.<sup>18</sup>

As noted by the County, "[a]gricultural land east of US 1 is vulnerable to storm surge from a Category 2 or greater hurricane."<sup>19</sup> Saltwater intrusion and flooding of agricultural lands is particularly dangerous because it "can negatively impact soil and water health by unlocking legacy fertilizer and through sulfidation leading to the accumulation of toxic hydrogen sulfide."<sup>20</sup>

The redevelopment of the SDLTD Property, which will require the site to be raised out of the Flood Zone, will allow for longer-term development and sustainable land use in the face of sea level rise, increased flooding, and saltwater intrusion. Moreover, the development of the SDLTD Property will no longer require the tons of fertilizer and pesticides needed to coax crops from marginally suitable agricultural land.

Given the specific vulnerability of agricultural uses in and near the SDLTD Property to sea level rise and saltwater intrusion, re-designation to the proposed Special District and redevelopment of the land to remove it from the floodplain is appropriate and consistent with the County's broader resiliency and sea level rise mitigation goals and policies.

### **Agricultural Use in the SDLTD is Only Maintained through Damaging Seasonal Drawdowns.**

The SDLTD Property is located in the East Glade agricultural area (east of the UDB) within a UEA and contiguous to the current UDB. As noted by the County in its March 2021 draft "Urban Area Expansion Report", the East Glade agricultural area "is made farmable by

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<sup>18</sup> Miami-Dade County Department of Regulatory & Economic Resources, *Flood Zone Maps* (last visited July 30, 2021), <https://www.miamidade.gov/environment/flood-maps.asp>.

<sup>19</sup> Miami-Dade County, *Sea Level Rise Impact on the Agricultural Community in Miami-Dade County* (Sept. 2020), pg. 11.

<sup>20</sup> *Id.* See below and Exhibit E for the discussion demonstrating that the SDLTD will result in a significant reduction of pollutant discharge when compared with the current agricultural uses on the SDLTD Property.

seasonal drawdowns of the water table" which have been identified as negatively impacting Biscayne Bay.<sup>21</sup> Further, "[t]hese seasonal drawdowns may also become harder to maintain as groundwater levels increase in the East Glade area as a result of sea level rise."

The timing of the agricultural drawdown also has negative consequences considering the constant threat of saltwater intrusion to the County's potable water sources. The annual release of freshwater occurs at the time of year when sea levels tend to be highest. The risk of saltwater intrusion is greatest when the freshwater stage elevations at the control structures are only slightly higher (or at the same level) as the saltwater levels. Therefore, maintaining artificially lower freshwater levels to meet agricultural demands during the dry season conflicts with the need to maintain higher freshwater levels to prevent saltwater intrusion.

Given that agricultural uses in the SDLTD Property are possible solely because of seasonal drawdowns which have negative environmental impacts, and such drawdowns are becoming difficult to maintain, re-designation of the SDLTD to the requested Special District provides an opportunity to elevate the land to a higher, better, and more sustainable use.

The agricultural lands within the SDLTD Property are dependent upon drawdowns which may become harder to maintain in the future,<sup>22</sup> and the area is already located within a UEA contiguous to the UDB. Thus, re-designation of the SDLTD's land use to the requested Special District on the FLUM will allow for continuity between complementary uses that are sustainable in the long-term.

### **The SDLTD Property Inefficiently Produces Agricultural Commodities and Can Better Serve the County's Economy through Development as a Logistics/Distribution District.**

Despite a current land use designation of "Agriculture," the SDLTD site is inefficiently used for agricultural purposes. The SDLTD area does not wholly produce agricultural commodities: only a portion of the area produces cropland and nursery agricultural commodities,

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<sup>21</sup> Miami-Dade County, Draft Urban Area Expansion Report 29 (Mar. 2021), pg. 33.

<sup>22</sup> *Id.* at 35 (noting that Figure 14 highlights the SDLTD Property's 2005 tree crops and field/row crops as watershed sub basins affected by seasonal drawdown operations).

and the rest does not produce noted agricultural commodities.<sup>23</sup> Thus, the property is not currently a vital component of the County's agricultural lands. The requested SDLTD amendment will revitalize and activate the subject properties. Re-designation will allow for development of a dynamic commercial hub that will provide greater economic contribution and employment opportunities to the County than the existing underutilized agricultural lands.

Re-designation will also allow for the increase in employment opportunities for the region. Agricultural uses employ a relatively small number of people, ranging from 9.9 jobs to 31.2 jobs per million dollars of sales, depending on the crop, and local versus outside sales.<sup>24</sup> With the potential for decreased drawdown, either because of the need to reduce negative impacts from the drawdown on Biscayne Bay or because of the impact of sea level rise, any existing agricultural jobs are at risk. By contrast, the SDLTD will create thousands of jobs, greatly increasing the employment opportunities in the area.

### **The SDLTD Will Reduce Existing Impacts on Biscayne National Park.**

The SDLTD site is located near to Biscayne National Park and is bisected by the C-102 canal, which provides drainage for a large portion of the immediate area. There is a long-standing concern regarding the health of Biscayne Bay, which is subjected to salinity changes caused by irrigation wells and seasonal drawdowns as well as the impact of excessive nutrients resulting from human activity.

The SDLTD team has conducted a comprehensive review of the impacts of the project on Biscayne Bay. The full environmental analyses are attached to this white paper.<sup>25</sup> In sum, the SDLTD will: (1) result in a reduction of water use with the project footprint; (2) improve water quality of discharges to Biscayne Bay; and (3) reduce pulse discharges of water to Biscayne Bay. The reduction in water use and pollutant discharge will be significant.

Water Use. The development of the SDLTD will significantly reduce water demand on the site. Based on consumptive use permits issued by SFWMD, the existing uses within the

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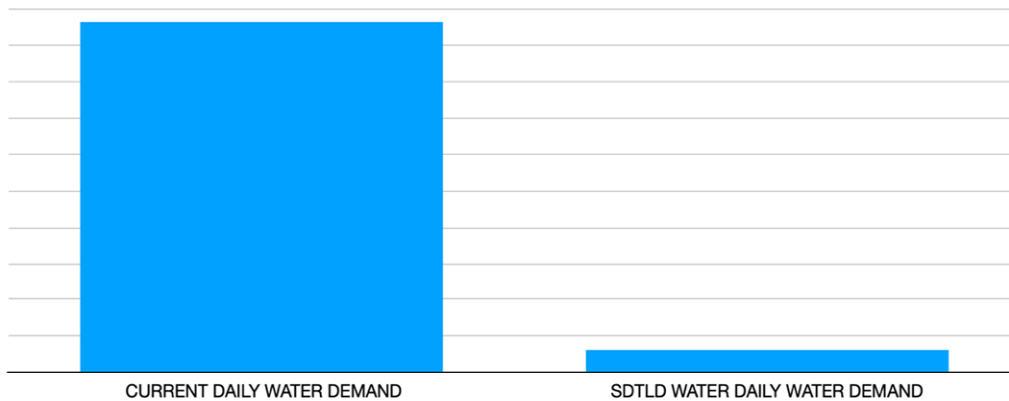
<sup>23</sup> See *id.* at 32 (noting that in Figure 12, the SDLTD Property is shown in large part to not produce any agricultural commodities).

<sup>24</sup> University of Florida Institute of Food and Agricultural Sciences, *Miami-Dade County Agricultural Land Retention Study: Summary and Recommendations* (2002) Appendix B, pg. 17.

<sup>25</sup> The attached report at Exhibit J of the Appendix also analyzes the impact of the SDLTD on protected species and discusses wetlands resources.

SDLTD site are permitted to draw 1,410 million gallons annually directly from the aquifer, which equates to approximately 3.86 million gallons per day (“GPD”). Based on the total areas provided for each of the proposed uses associated with the SDLTD development, the flow calculation was estimated by the Miami-Dade County WASD to be 247,065 GPD.

The SDLTD demand, which will be potable water from the County’s wellfields far from the Bay, is 6 percent of the current water demand permitted to be taken directly from the aquifer.



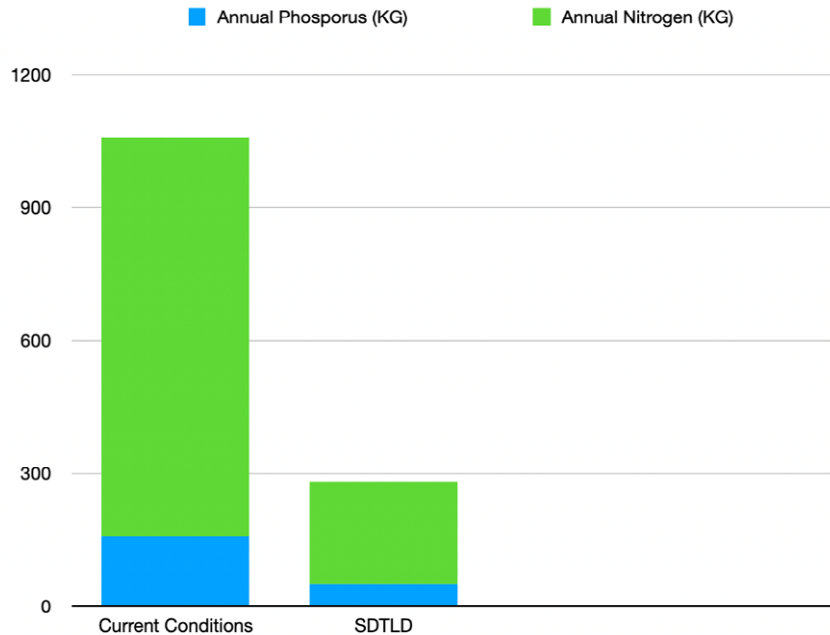
Nutrient Discharge. The SDLTD site currently has no stormwater management system in place. As a result, the direct discharge of runoff from the agricultural uses on the property enter the C-102 canal with no water quality or quantity treatment.

The 2019 Biscayne Bay Report Card noted that the adjacent area of Biscayne Bay was an “impaired area” due to increased nutrient loading from canal discharges. Discharges released to the Bay from the County’s regional canal system contain untreated stormwater runoff with high nutrient concentrations and other pollutants that cause the degradation of natural ecosystems.

The development of the SDLTD would result in a significant reduction of nutrient loading to the approximately four-mile perimeter of the C-102 canal that runs through the subject property. The improved stormwater management system proposed as part of the SDLTD development would allow for onsite retention of runoff. That retention would, in turn, allow for a significant reduction of discharge volume to the Bay. The full analyses are attached as part of the Appendix to this white paper.

Currently, the properties within the SDLTD are estimated to discharge 901.28 kg/year of nitrogen and 156.75 kg/year of phosphorus annually, with 757-acre feet of water entering

the C-102 canal system through runoff. As a result of the stormwater management system that will be put in place as part of the development, nutrient loading will be reduced to an estimated 228.7 kg/year of nitrogen and 49.55 kg/year of phosphorus, an approximate 74 percent reduction in combined discharges, with zero direct runoff into the C-102 canal.

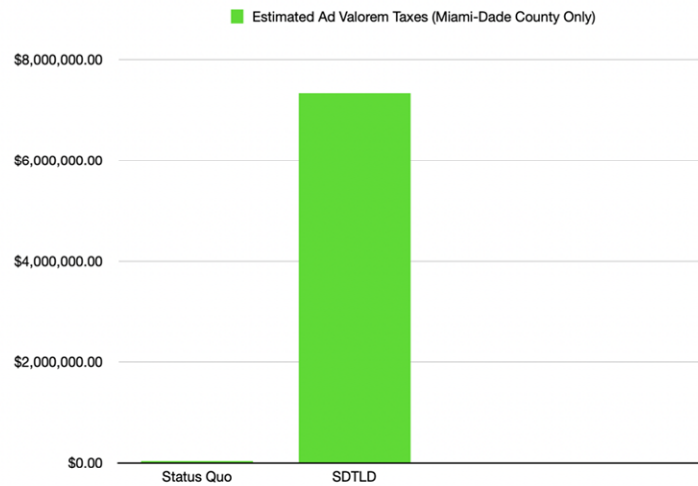


**The SDLTD will Produce Significant Economic Benefits to the County and Approximately 11,000 Permanent Jobs.**

The SDLTD development will produce significant direct and indirect economic benefits to the County.

Impact and Connection Fees. It is currently estimated that the SDLTD development would generate more than \$52.0 million in road impact fees. As noted above, the Phase I and Phase II SDLTD developers have agreed to pay the “proportionate share” (pursuant to Section 163.3180, Florida Statutes) of the District’s significant impact on offsite roadways where the impacts exceed 5 percent of the roadway’s capacity. The SDLTD police and fire impact fees are estimated at \$3.86 million and \$13.6 million respectively. Neither the Police Department nor the Fire Rescue Department have concluded that additional capital facilities will be required to serve the SDLTD. Water and sewer connection fees are estimated at approximately \$1.7 million.

Annual Property Taxes. The SDLTD’s consultant has estimated that, based on the millage rates currently in effect, the County will collect approximately \$3.5 million annually for its General Fund and \$1.44 million for its UMSA Fund when the District is fully developed. Total property tax revenues for the Fire Fund are estimated at \$1.8 million annually. Despite not generating any school children, the SDLTD is estimated to provide Miami-Dade County Public Schools with \$5.39 million annually. The current overall property taxes paid by all land in the SDLTD is approximately \$43,000. The SDLTD development will therefore increase the annual property taxes generated by the area by approximately \$7.2 million, an increase of approximately 16,644 percent.



Overall Fiscal Impact. The SDLTD will have a positive net fiscal impact on the local economy and on Miami-Dade County’s budget. Miami-Dade County will not be required to pay for any capital improvements for the development of the SDLTD; the Applicant and Co-Applicants have committed to pay for all necessary infrastructure to serve the district. Although it is impossible to determine definitively the likely cost for the County to serve the SDLTD development on an ongoing, operating and maintenance basis, it has been demonstrated that industrial and commercial uses result in a positive net fiscal impact to local governments.

Recent annexation applications, which require County staff to analyze the net gain or loss of revenue to the County are good examples of this phenomenon. For example, the County’s staff analysis of an annexation application filed by the City of Doral for the square mile “Section 6” area developed with a mix of industrial and commercial uses concluded

that the area's County ad valorem revenue was 2.18 times the cost to provide the area with County services.

With no residential uses to serve, infrastructure installed at the sole cost of the developers, the payment of over \$71 million in various development fees, and an estimated ad valorem tax generation of \$7.3 million annually, SDLTD will more than "pay for itself," even when the positive economic impact of the anticipated job creation is not taken into account.

Employment. It is estimated that the SDLTD's development program will result in a total of 17,446 permanent jobs: (1) 11,428 estimated direct permanent jobs; and (2) 6,018 estimated indirect and induced permanent jobs.

### **Conclusion.**

The SDLTD represents a once in a generation opportunity to reverse a long-term development pattern that has left South Dade with no real economic engine. With 87 percent of the urban land south of SW 8<sup>th</sup> Street developed with single-family houses, the growing population of South Dade continues to suffer higher unemployment and tiresome commutes. The SDLTD will help repair an imbalance that has located the vast bulk of the County's industrial and logistics land in the County's Northern and North-Central Tiers. The SDLTD will also help bring the County closer to the ratio of distribution/logistics space per person of other major cities in the United States, improving the County's overall industrial real estate market.

The SDLTD is being proposed at time where macroeconomic trends have led to the need for larger unified industrial sites to serve the logistics and distribution needs of the community. Today, all 22 of the County's premiere distribution/logistics center projects are located in the Northern and North-Central Tiers.

The SDLTD Property is marginally viable for continued agriculture use and the development of the SDLTD will significantly reduce environmental impacts to the aquifer and Biscayne National Park. The SDLTD will create thousands of construction<sup>26</sup> and permanent jobs, with private developers funding all necessary infrastructure for non-residential uses that will generate far more property taxes than needed to serve the area, representing a significant net benefit to Miami-Dade County.

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<sup>26</sup> The SDLTD's consultant estimates that the District will create 13,423 direct, indirect, and induced non-recurring jobs during the development phase.